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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission,  
  
Plaintiff,  
  
v.  
  
Jason Cardiff, et al.,  
  
Defendants.

Case No. ED 5:18-cv-02104-  
DMG-PLAx

**NON-PARTY TRUE  
PHARMASTRIP, INC.'S  
LIMITED OBJECTION TO  
JUDGMENT CREDITOR  
INTER/MEDIA'S MOTION  
TO COMPEL RECEIVER TO  
CURE ARREARAGES  
[DKT. 440]**

Date: Sept. 4, 2020  
Time: 9:30 AM  
Place: Courtroom 8C

**OBJECTION**

True Pharmastrip, Inc. (“TPI”) files this limited objection to the Motion To Compel filed by judgment creditor Inter/Media Time Buying Corporation on August 7, 2020. (Dkt. 440.) TPI respectfully requests that any order entered on Inter/Media’s motion make clear that no portion of the \$1,205,984.80 USD that TPI deposited with the Receiver on August 27, 2019 (the “Deposited Funds”) may be used to pay arrearages on the mortgage owed by Defendants Jason and Eunjung Cardiff on their Upland, California, house.

The Court assured TPI that it would have an opportunity to litigate return of the Deposited Funds. (*See* Dkt. 256, at 7 (quoting 8/27/19 RT 14-15).) TPI moved to intervene for the limited purpose of establishing that the Deposited Funds, raised from third-party investors, were not the proceeds of the unlawful activity alleged against Defendants in the Complaint, are not properly part of the receivership estate, and thus should not be used to pay any judgment that may issue against the Cardiffs or to pay any of the Receiver’s fees. (Dkt. 231.) The Court denied TPI’s motion on timeliness grounds (Dkt. 256), and TPI’s appeal from that ruling is now fully briefed and awaiting oral argument.

The Receiver has represented to the Court and to counsel for TPI—most recently at the July 7, 2020, hearing on the Order to Show Cause (“OSC”) why the FTC’s application for a preliminary injunction should not be granted—that the Deposited Funds will be held in a separate bank account and not used for any purpose until TPI is heard on the threshold question of whether the Deposited Funds are a receivership asset.

Dated: August 12, 2020 SPERTUS, LANDES & UMHOFFER, LLP

By: /s/ James W. Spertus  
James W. Spertus  
M. Anthony Brown

*Attorneys for True Pharmastrip, Inc.*